IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

M. DIANE KOKEN, in her official capacity as Insurance Commissioner of the Commonwealth of Pennsylvania, as Liquidator of RELIANCE INSURANCE COMPANY (IN LIQUIDATION)

Plaintiff,

v.

GPC INTERNATIONAL, INC.

C.A. No. 05-223 (SLR)

Defendant.

GPC INTERNATIONAL, INC.

Third-Party Plaintiff,

v.

ZURICH-AMERICAN INSURANCE COMPANY

Third-Party Defendant.

NOTICE OF COMPLETION OF BRIEFING

Pursuant to D. Del. LR 7.1.2, briefing on Defendant and Third-Party Plaintiff GPC International, Inc.'s ("GPC") Motion for Adjournment of Discovery Schedule and Amendment of Scheduling Order (the "Motion") is complete.

On April 28, 2006, GPC filed and served its Motion for Adjournment of Discovery Schedule and Amendment of Scheduling Order. (D.I. 43)

On May 15, 2006, Plaintiff, M. Diane Koken, as Liquidator of Reliance Insurance Company, filed and served Plaintiff's Response in Opposition to Defendant's Motion for Adjournment of Discovery Schedule and Amendment of Scheduling Order. (D.I. 52)

On May 22, 2006, GPC filed and served its Reply in Further Support of its Motion for Adjournment of Discovery Schedule and Amendment of Scheduling Order. (D.I. 53)

All briefing related to the Motion has been completed. Pursuant to D. Del. LR. 7.1.4., GPC respectfully requests that oral argument be held on the Motion at the convenience of the Court, and that such argument be scheduled at the same time as argument on GPC's Motion for Leave to File an Amended Answer. (See D.I. 51, Notice of Completion of Briefing).

BOUCHARD MARGULES & FRIEDLANDER, P.A.

Of Counsel:

Herbert C. Ross, Esquire Lori Marks-Esterman, Esquire OLSHAN GRUNDMAN FROME ROSENZWEIG & WOLOSKY LLP Park Avenue Tower 65 East 55th Street New York NY 10022

Dated: May 22, 2006

By /s/ John M. Seaman

Andre G. Bouchard (#2504)
John M. Seaman (#3868)
222 Delaware Ave, Suite 1400
Wilmington, DE 19801
Telephone: (302) 573-3500
abouchard@bmf-law.com
jseaman@bmf-law.com

Attorneys for Defendant and Third-Party Plaintiff GPC International, Inc.